



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

RESPONSIVENESS SUMMARY TO COMMENTS RECEIVED DURING PUBLIC NOTICE

For

Proposed Air Quality Control Permit Number 1000604

El Paso Natural Gas Company, Alamo Lake Compressor Station

Begin Public Notice : October 15, 1997

End Public Notice : November 14, 1997

All of the following comments were submitted by El Paso Natural Gas Company.

Comment 1: Facilities or Equipment Description - The Solar Taurus T6500 site rated horsepower should be 5150 HP at site elevation and 80° F. The original installation permit listed the ISO rated horsepower corrected to site elevation but not corrected to 80° F. The GE 3142 RJ site rated horsepower should be 11380 HP at site elevation and 80° F. Earlier, the GE site rated horsepower was calculated using a performance curve for a similar unit. Our Reliability Engineering department reviewed the most up-to-date performance curves for the units to determine the site horsepower.

Response: The site rated horsepower has been changed accordingly at the appropriate places.

TABLE 1 : Summary of Permit Requirements

Comment 2: SOx Monitoring/Recordkeeping for P1, P2 - The "< 0.017 wt% (5gr/scf) should be replaced with "0.8 percent by weight" since the sulfur dioxide standard in R18-2-719.J references 0.8 weight percent.

Response: EPNG is required under FERC agreement to limit sulfur content in natural gas to less than 5 gr/scf which is equivalent to 0.017 weight percent. Our regulations require EPNG to limit the sulfur content to less than 0.8 weight percent. FERC stipulated 0.017% was specified as a reference. This has been removed to make the table consistent with the statements in permit conditions II.A.1 and II.B.1 of Attachment "B". The table has been updated to reflect this change.

Comment 3: F4. a. and b. Mobile Sources Monitoring/Recordkeeping - The language should be revised as follows:

Record of all emissions related maintenance activities performed on Permittee's roadway and site cleaning machinery stationed at the facility.

Response: The table has been modified to include the language "stationed at the facility" in F4.b. In addition, F4.a. has been changed to read as follows:

Record of all emissions related maintenance activities performed on Permittee's off-road machinery stationed at the facility.

ATTACHMENT A

Comment 4: II. Compliance with permit conditions:

A. The first sentence of this provision should be reworded to conform to the permit shield provisions of R18-2-325:

The Permittee shall comply with all conditions of this permit, which sets forth all applicable requirements of Arizona's air quality statutes and the air quality rules.

The existing language could be read as requiring the Permittee to comply with "all applicable requirements" which contradicts the purpose of a Class I permit.

Response: ADEQ agrees with EPNG. This change has been made in the permit.

Comment 5: XVII. Testing Requirements

EPNG understands that normal rated capacity means capacity reflecting ambient temperature, pressure and humidity conditions present during the emissions test. EPNG also understands that ADEQ's inclusion of the provision allowing for performance testing at lower operational rates with the Director's prior written approval acknowledges that at certain times there may be insufficient natural gas throughput to operate at "normal rated capacity" in which case testing may be deferred or conducted at a lower operating rate. While EPNG would prefer that ADEQ include permit language defining normal rated capacity as capacity reflecting ambient conditions and available pipeline capacity, EPNG is willing to accept ADEQ's explanation of its intent in the Technical Document and response to these comments.

Review

Response: ADEQ is aware that EPNG may or may not operate the turbine(s) at their normal rated capacity, during the life of the permit. Given the unpredictability in operations, it was decided that the optimal course of action would be to obtain written approval from the Director at the time of testing, if the testing is to be performed at a lower rate. This comment does not result in a change in the permit language.

ATTACHMENT B

Comment 6: I. Emissions Limitations (I.B.2)

Revise "Sulfur Dioxide Standard" to read "Sulfur Content Standard"

Response: This has been changed in the permit.

Comment 7: I. Emission Limitations (I.C.1.b.3)

EPNG understands that dust suppressants or wetting agents are to be used during construction operations, repair operations, and demolition activities directly associated with earth moving or excavation activities likely to generate excessive amounts of particulate matter and not for any construction operation, repair operation, or demolition activity. EPNG requests ADEQ clarification if this is not ADEQ's intent.

Response: The intent of condition I.C.1.b.3 of Attachment "B" of the permit is to regulate excessive emissions of particulate matter. The intent of this condition is further clarified by the wording of condition I.C.1.b which is as follows: "Permittee shall employ the following methods to *prevent excessive amounts of particulate matter from becoming airborne*:". Those construction, repair, or demolition operations that have no associated particulate matter emissions are not subject to the requirements of condition I.C.1.b.3 of Attachment "B" of the permit. This comment does not result in a change in the permit language.

Comment 8: Emissions Limitations

On occasion, EPNG personnel will need service air conditioners at remote compressor stations. Therefore, we need to add #5. When contracting air conditioner maintenance service, the contractor will ensure that requirements of 40 CFR 82-Subpart F are met. Since some parts of Subpart F are applicable only to manufacturers or importers of recycling equipment or other particular situations, the language below notes that only “applicable” requirements must be met by EPNG.

5. Nonvehicle Air Conditioner Maintenance and/or Services

When Permittee’s employees are servicing applicable appliances, the permittee shall comply with applicable requirements of 40 CFR 82- Subpart F.

Response: The Permittee had originally included air conditioning servicing, expected to be performed by outside contractors, in the permit application. During the public comment period, EPNG decided that they might perform such activities themselves and requested for the inclusion of applicable requirements of 40 CFR 82 - Subpart F in the permit. A condition to this effect has been added in I.D.5 in Attachment “B” of the permit.

Comment 9: Monitoring and Recordkeeping (II.A.1)

EPNG understands that we need to maintain an updated copy of the extracted portion of the FERC approved tariff which pertains to the sulfur content and lower heating value of the fuel and not the entire FERC tariff which is a voluminous and periodically edited document. EPNG requests ADEQ clarification if this is not ADEQ’s intent.

Response: The intent of conditions II.A.1 and II.B.1 of Attachment “B” of the permit is to monitor particulate and sulfur dioxide emission standards only. The language has been modified to further clarify that tariff information relating only to lower heating value and fuel sulfur content needs to be kept on file. The modified language is reproduced below:

Permittee shall monitor daily, the sulfur content and lower heating value of the fuel being combusted in the gas turbine. This requirement may be complied with by maintaining a copy of that part of the Federal Energy Regulatory Commission (FERC) approved Tariff agreement that limits transmission to pipeline quality natural gas of sulfur content less than 0.8 percent by weight and having a heating value greater than or equal to 967 Btu/ft³.

Comment 10: Monitoring and Recordkeeping (II.C.1)

For a more streamlined permit, EPNG suggests that ADEQ consider combining the identical provisions of II.C.1.(3) through II.C.1(9) EPNG proposes

c. Dates on which any of the activities listed in I.C.1.b.(3) through (9) were performed, and control measured adopted.

Response: The current format of condition II.C.1 of Attachment “B” of the permit will be retained as it enhances the readability of the permit.

Comment 11: Monitoring and Recordkeeping (II.D.1)

A record of the abrasive blasting project requires a log in ink. EPNG requests that “in ink” be removed since it implies that a handwritten rather than a printed electronic log must be kept. Many other agencies such as DOT and Arizona Corporation Commission accept electronic recordkeeping.

Since EPNG must comply with the every 6 month compliance certification, it is our duty to assure that the records are accurate and complete.

Response: The language of condition II.D.1 of Attachment “B” of the permit has been modified as follows:

“Each time an abrasive blasting project is conducted, the Permittee shall log in ink **or in an electronic format**, a record of the following:....”

Comment 12: *Monitoring and Recordkeeping (II.D.2.a)*

A record of the spray painting project requires a log in ink. EPNG requests that “in ink” be removed since it implies that a handwritten rather than a printed electronic log must be kept. Many other agencies such as DOT and Arizona Corporation Commission accept electronic recordkeeping. Since EPNG must comply with the every 6 month compliance certification, it is our duty to assure that the records are accurate and complete.

Response: The language of condition II.D.2.a of Attachment “B” of the permit has been modified as follows:

“Each time an spray painting project is conducted, the Permittee shall log in ink **or in an electronic format**, a record of the following:....”

Comment 13: *Monitoring and Recordkeeping (II.D.3)*

EPNG continues to assert that there is no strict correlation between maintenance activities and exceeding the 40 % opacity standard for mobile sources. EPNG objects to the current provision to the extent that it seeks to require recordkeeping of mobile sources that are not permanently or semi-permanently maintained at this station. EPNG understands that equipment brought in from other areas of the system must comply with the mobile source requirements of R18-2-802 and R18-2-804(a), but mobile equipment stationed elsewhere should not be subject to site-specific permit requirements. EPNG has mobile sources located in El Paso, Gallup, and other locations within the EPNG system. The current permit language requires a record of maintenance activities of Permittee’s equipment. “Permittee’s equipment” could mean equipment stationed in El Paso or other EPNG locations that would never be used at the permitted facility. Therefore, EPNG requests that the permit language be revised as follows:

The Permittee shall keep a record of all emissions related maintenance activities performed on Permittee’s mobile sources stationed at the facility as per manufacturer’s specifications.

Response: ADEQ agrees with EPNG. The language of condition II.D.3 has been changed to include “stationed at the facility”.

Comment 14: *Monitoring and Recordkeeping*

On occasion, EPNG personnel will need service air conditioners at remote compressor stations. Therefore, we need to Add #5. When contracting air conditioner maintenance service, the contractor will ensure that requirements of 40 CFR 82-Subpart F are met. Since some parts of Subpart F are applicable only to manufacturers or importers of recycling equipment or other particular situations, the language below notes that only “applicable” requirements must be met by EPNG.

5. Nonvehicle Air Conditioner Maintenance and/or Services

As a means of demonstrating compliance with condition I.C.5 of this Attachment, the Permittee shall keep a record of all relevant paperwork of 40 CFR Part 82-Subpart F applicable

requirements on file.

Response: Please see the response to Comment No. 8. A condition to this effect has been added in II.D.5 of Attachment "B" of this permit.

Comment 15: *Testing Requirements (IV.A1)*

may *At some EPNG locations, there is a high pressure pipeline system and low pressure pipeline system that is distinct and each system is connected to only one particular turbine unit. Therefore, if there is no means of routing the natural gas between the systems, one unit may operate while the other not. Since the intent of the requirement is to mandate testing of a particular unit, the fifteen cumulative days should be unit specific rather than location specific.*

The requirement to conduct a performance test on the GE turbine engine if the cumulative days of operation of all engines during the permit term exceed fifteen days should be changed to read as follows:

Permittee shall conduct performance tests on the General Electric turbine engine if the cumulative days of operation of the unit during the permit term exceed fifteen days.

Response: ADEQ agrees with EPNG and recognizes the physical limitations imposed by the high pressure and low pressure pipeline systems. The language of IV.A has been modified as follows:

"Permittee shall conduct one set of performance tests on the General Electric turbine if the unit is operated for more than 15 days during the permit term. These performance tests shall be completed within six months prior to this permit expiration. Each set of performance tests shall include all of the pollutants listed in Section IV.B of this Attachment."

Comment 16: *Testing Requirements(IV.C)*

method. *Although there are no specific test methods for the NSPS and HAP sources, EPNG requests that we be allowed to retain the flexibility to petition ADEQ to utilize an alternative or equivalent test method.* *Since ADEQ always has the choice in refusing or allowing an alternative and equivalent test for any emissions test, the proposed language will not hinder ADEQ's authority. Therefore, EPNG requests that the Section C be revised to read as follows:*

Permittee may submit an alternate and equivalent test method(s) to the Director in any test plan for approval by the Director.

Response: A.A.C. R18-2-311(D) expressly states that:

"Except for ambient air monitoring and emissions testing required under Articles 9 and 11 of this Chapter, alternative and equivalent test methods in any test plan submitted to the Director may be approved by the Director ..."

There is no change in the permit term.

ATTACHMENT C

Comment 17: *The current table for Article 9 implies that the 40 CFR 60, Subpart A General Provisions would be applicable to the non-NSPS GE unit. Therefore, it should read as follows:*

Article 9 - New Source Performance Standards (Solar Taurus T6500 Gas Turbine only)

Response: This change has been made in the permit.

Comment 18: *EPNG requests that the following additional item be added to the list of “requirements specifically identified as applicable”:*

40 CFR 82 - Protection of Stratospheric Ozone - Subpart F - Recycling and Emissions Reduction

Response: Please see the response to Comment No. 8. This item has been added to the relevant list in Attachment C of the permit.

ATTACHMENT D

Comment 19: *The Date of Manufacture in the table should be changed to “Date of Installation/Date of Manufacturer” since the manufacture date is unknown.*

Response: The column heading has been changed to Date of Installation/Date of Manufacture.

Comment 20: *Revise size of Solar Turbine to 5150 HP and GE Turbine to 11380 HP.*

Response: This has been changed in the permit.

ATTACHMENT E

Comment 21: *Remove Item 33 since Item 1 addresses the generator set used for emergency replacement or standby service.*

Response: Item 33 has been combined with Item 1.